

From: [Licensing Staff](#)
To:
Subject: FW: IW Section 99E Consent Response - P1171-01 EIMS:0680001181
Date: Wednesday 8 June 2022 10:08:00
Attachments: [image.png](#)
[P1171_01_Amazon_S99E_Response_.pdf](#)
[EPA Cover Letter.pdf](#)

From: WWSCL@water.ie <WWSCL@water.ie>
Sent: Tuesday 7 June 2022 16:02
To: Licensing Staff <licensing@epa.ie>
Cc: Ronan Connolly <rconnolly@water.ie>; pricing <pricing@water.ie>; Irish Water - Section 99 <section99@water.ie>
Subject: IW Section 99E Consent Response - P1171-01 EIMS:0680001181

Dear Sir/Madam,

Please find attached the Section99e consent response for Amazon Data Services Ireland Limited, Clonshaugh Business & Technology Park, Dublin 17



Best Regards,

Andrew England
Wastewater Source Control & Licensing

Irish Water Team

Uisce Éireann

Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86,
Éire

Irish Water

Colvill House, 24-26 Talbot Street, Dublin 1, D01 NP86, Ireland

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Thank you for your attention.

Tá an fhaisnéis á seachadadh dírithe ar an duine nó ar an eintiteas chuig a bhfuil sí seolta amháin agus féadfar ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh tráchtála de a bheith mar chuid de. Tá aon athsheachadadh nó scaipeadh den fhaisnéis, aon athbhreithniú ar nó aon úsáid eile a bhaint as, nó aon ghníomh a dhéantar ag brath ar an bhfaisnéis seo ag daoine nó ag eintitis nach dóibh siúd an fhaisnéis seo, toirimisce agus féadfar é a bheith neamhdhleathach. Níl Uisce Éireann faoi dhliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Ní ghlacann Uisce Éireann le haon dliteanas faoi ghnímh nó faoi iarmhairtí bunaithe ar úsáid thoirmiscithe na faisnéise seo. Níl Uisce Éireann faoi dhliteanas maidir le seachadadh ceart agus iomlán na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Má fuair tú an teachtaireacht seo in earráid, más é do thoil é, déan teagmháil leis an seoltóir agus scríos an t-ábhar ó gach aon ríomhaire. Féadfar ríomhphost a bheith soghabhálach i leith truaillithe, idircheaptha agus i leith leasaithe neamhúdraithe. Ní ghlacann Uisce Éireann le haon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo i ndiaidh é a sheoladh nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin. Más é do thoil é, tabhair faoi deara chomh maith go bhféadfar monatóireacht a dhéanamh ar theachtairachtaí chuig nó ó Uisce Éireann chun comhlíonadh le polasaithe agus le caighdeáin Uisce Éireann a chinntiú agus chun ár ngnó a chosaint. Fochuideachta gníomhaíochta de chuid Ervia is ea Uisce Éireann atá faoi theorainn scaireanna, de bhun fhorálacha an tAcht um Sheirbhísí Uisce 2013, a bhfuil a bpríomh ionad gnó ag 24-26 Teach Colvill, Sráid na Talbóide, BÁC 1.

Go raibh maith agat as d'aird a thabhairt.



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EPA Headquarters,
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Reg No: P1171-01

03/06/2022

Dear Sir/Madam,

I refer to your correspondence dated 28/Jan/2022 relating to an application from Amazon Data Services Ireland Limited, Clonshaugh Business & Technology Park, Dublin 17 for **Section 99E Consent Request**.

Please find attached Irish Water's recommendation attached.

If you have any further queries please do not hesitate to contact us.

Yours sincerely

Wastewater Source Control & Licensing

IRISH WATER RESPONSE

Irish Water
Colvill House
24/26 Talbot Street
Dublin 1

Name of Facility: Amazon Data Services Ireland Limited Reg. No: P1171-01

Location Address: Amazon Data Services Ireland Limited, Clonsbaugh Business & Technology Park, Dublin 17, D17 V088

Recommendation granted subject to the consent conditions outlined below.	Yes
Recommendation granted without conditions.	N/A
Recommendation refused ^{Note 1} .	N/A

The sewer, to which this consent relates, is vested or controlled by Irish Water.	No
Does the consent constitute a material change with respect to the associated waste water discharge authorisation? ^{Note 2} (If 'Yes', you must attach to the consent a document describing the measures to be taken to bring about compliance with the waste water discharge authorisation including timeframes where appropriate.)	No

Indicate either "Yes" or "No" to the request to include the condition(s) below in the licence as follows:

GENERAL CONSENT CONDITIONS	Condition to be Included (Yes/No)
1. Other than the trade effluent authorised to be discharged under this licence, the licensee shall at no time discharge or cause or permit to discharge into sewer trade effluent or any other matter unless authorised in writing by Irish Water.	Yes
2. Monitoring and analysis equipment shall be installed, operated and maintained as necessary, so that all monitoring, accurately reflects the emission/discharge.	Yes
3. The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out below and as in accordance with <i>Schedule C: Control & Monitoring</i> , of this licence. (i) Sampling and analysis shall be undertaken by competent staff in accordance with documented operating procedures.	Yes

(ii) Such procedures shall be subject to a programme of Analytical Quality Control using appropriate control standards with evaluation of test responses. (iii) Where any analysis is sub-contracted it shall be outsourced to a competent laboratory.	
4. The licensee shall ensure that any trade effluent generated from canteen activities shall pass through appropriate grease removal equipment prior to discharge to sewer.	Yes
5. The licensee shall maintain and implement a detailed programme for maintenance of all plant and equipment based on the instructions issued by the manufacturer/supplier or installer of the equipment or as otherwise approved in writing by IW.	Yes
6. A summary report of volumes of trade effluent and other matter discharged to the sewer along with monitoring and analysis data as specified in <i>Schedule B: Emission Limits to Sewer</i> and <i>Schedule C: Control & Monitoring</i> , of this licence shall be forwarded to both Irish Water and the Local Authority in a manner and timeframe as may be specified by Irish Water.	Yes
7. The licensee shall prepare, maintain and implement (text highlighted in black bold for new licence only) / maintain and implement (text highlighted in green bold for reviews) a Schedule of Environmental Objectives and Targets. The Schedule shall, as a minimum, provide for a review of all operations and processes, including an evaluation of practicable options, for energy and resource efficiency, the use of cleaner technology, cleaner production and the prevention, reduction and minimisation of waste and shall include waste reduction targets, reduction and diversion of storm water runoff to sewer. The Schedule shall include time frames for the achievement of set targets and shall address a five-year period as a minimum. The schedule shall be reviewed annually and submitted to Irish Water as requested.	No
8. The licensee shall pay to Irish Water such sum as may be determined from time to time, having regard to the variations in the cost of providing drainage and the variation in effluent reception and treatment costs. Payment is to be made on demand from Irish Water.	Yes
9. Silt Traps and Oil Separators The Licensee shall, within six months of date of grant of this licence, install and maintain silt traps and oil separators at the Facility: (i) Silt traps to ensure that all storm water discharges, other than from roofs, from the facility pass through a silt trap in advance of discharge; (ii) An oil separator on the storm water discharge from yard areas. The separator shall be a Class I Class II full retention/by-pass separator. <<EPA to select as appropriate>> (iii) The silt traps and separator shall be in accordance with I.S. EN-858-2: 2003 (separator systems for light liquids).	Yes
10. The licensee shall conclude an end user agreement with Irish Water.	Yes
11. In the event of any incident which relates to discharges to sewer having taken place, the licensee shall notify Irish Water and the Local Authority, in the manner prescribed by Irish Water, as soon as practicable after such an incident.	Yes
12. No alteration to, or reconstruction in respect of, the activity, or any part thereof, that would, or is likely to, result in (i) a material change or increase in: <ul style="list-style-type: none"> ▪ the nature or quantity of any emission; ▪ the abatement/treatment or recovery systems; ▪ the range of processes to be carried out; ▪ the fuels, raw materials, intermediates, products or wastes generated, or (ii) any changes in: <ul style="list-style-type: none"> ▪ site management, infrastructure or control with adverse environmental significance; shall be carried out or commenced without prior notice to, and without the approval of, the Agency and/or Irish Water as appropriate .	Yes
13. No specified emission from the installation shall exceed the emission limit values set out in Schedule B: Emission Limits, of this licence. There shall be no other emissions of environmental significance.	Yes

ADDITIONAL GENERAL CONSENT CONDITIONS In respect of discharges or emissions to sewers, in accordance with Section 99E of the Environmental Protection Agency Act 1992, as amended. <i>(Specify, if required)</i>

Limit Values for Process Effluent to IDA Drain

Schedule B: Emission Limits

Emission Point Reference No.: **SE1**

Emission to **(Drain description)**: IDA drain located at Clonshaugh Business & Technology Park

Volume of Trade effluent emitted: Maximum in any one day: 10 m³

Parameter	Emission Limit Values		
pH	6-9 pH Units		
Temperature	30°C		
	Concentration (24 Hr. Composite Sample (mg/l))	Max. Concentration Grab (mg/l)	Max Daily Load (kg/day)
BOD 5 days with inhibition (Carbonaceous BOD)	50	100	0.5
COD - Cr	100	200	1
Suspended Solids	250	500	2.5
Fats, Oils & Greases	50	50	0.5
Chloride (as CL)	1000	1000	10
Sulphate	1200	1200	12
Total Hardness (as CaCO ₃)	2000	2000	20

Frequency of Monitoring Process Effluent to IDA Drain

Schedule C

Emission Point Reference No.: SE1

Parameter	Monitoring Frequency (Note 1 & 2)	Analysis Method/Technique
Flow to sewer	Continuous	On-line flow meter with recorder
pH	Continuous	pH electrode/meter & recorder
Temperature	Continuous	On-line Temperature probe with recorder
BOD 5 days with inhibition (Carbonaceous BOD)	Monthly	Standard Method
COD - Cr	Monthly	Standard Method
Suspended Solids	Monthly	Standard Method
Sulphate	Monthly	Standard Method
Chloride	Monthly	Standard Method
Total Hardness (as CaCO ₃)	Monthly	Standard Method
Respirometry	As Requested	Standard Method
Toxicity	As Requested	Standard Method

Note 1: All samples, excluding those for flow, pH and temperature, shall be collected on a 24 hour flow proportional composite sampling basis. **Note 2:** Sampling shall take place on alternate week days on a rolling basis to ensure representative samples are obtained for site operations which may vary across the working week.

Control of Emissions to IDA Drain

Description of treatment:

Control Parameter	Monitoring	Key Equipment

Signed on behalf of

DocuSigned by:
Andrew Cartwright
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7/6/2022

Date _____